

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

UNITED STATES OF AMERICA,)	
)	
Appellee,)	
)	
v.)	No. 21-3032
)	
THEODORE DOUGLAS,)	
)	
Appellant.)	

**UNOPPOSED MOTION FOR 60-DAY EXTENSION OF TIME
WITHIN WHICH TO FILE APPELLANT’S OPENING BRIEF**

Appellant Theodore Douglas, through undersigned counsel, respectfully moves this Court, pursuant to Circuit Rule 27(h), for a 60-day extension of time, from November 26, 2021, to January 25, 2022, to file his opening brief.

As grounds for this motion, undersigned counsel states:

1. Mr. Douglas pled guilty in this matter to possession of a firearm by a person previously convicted of a felony in violation of 18 U.S.C. § 922(g), and on May 24, 2021 was sentenced to 15 months’ incarceration followed by three years’ supervised release. Though Mr. Douglas has completed his sentence in this matter, he remains incarcerated on Superior Court matter.
2. This Court set a briefing schedule under which appellant’s opening

brief is due on November 26, 2021.

3. Due to multiple matters before this Court, most immediately a reply brief in *United States v. Russell*, No. 3080, due November 24, 2021, as well as numerous matters in the District Court, counsel has been unable to turn his full attention to completing Mr. Douglas's opening brief. Counsel anticipates that with the additional requested time, he will be able to properly engage with Mr. Douglas and complete the opening brief.

4. Counsel for the government has indicated that it does not oppose this request for extension of time.

WHEREFORE, appellant respectfully requests that this Court grant his motion for a 60-day extension of time to file his opening brief and order it due no sooner than January 25, 2022.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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**CERTIFICATE OF COMPLIANCE
WITH TYPE-VOLUME LIMITATION**

I hereby certify, pursuant to Federal Rule of Appellate Procedure 32(a), that the foregoing Motion for Extension was prepared in monospaced typeface using Microsoft Word in Century Schoolbook 14-point font and contains 242 words in compliance with the Court's type-volume limits.

_____/s/_____
TONY AXAM, JR.
Assistant Federal Public Defender